IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

KIM SNYDER, on behalf of herself and all others similarly situated,))
Plaintiff,) Case No. 0:21-cv-01049 (JRT/BRT)
v.)
UNITEDHEALTH GROUP, INC., et))
al.)
Defendants.)

JOINT REPORT SETTING FORTH PROPOSED AGENDA FOR JANUARY 14, 2022 STATUS CONFERENCE

Plaintiff Kim Snyder ("Plaintiff") and Defendants UnitedHealth Group, Inc., the Board of Directors of UnitedHealth Group, Inc., David S. Wichmann, the UnitedHealth Group Employee Benefits Plans Investment Committee, and the UnitedHealth Group Employee Benefits Plans Administrative Committee ("Defendants") (collectively, the "Parties") submit this Joint Proposed Agenda on behalf of all Parties as directed in the Court's Scheduling Order of October 21, 2021 (Dkt. No. 85).

The Parties hereby present the following agenda items for discussion at the upcoming status conference of January 14, 2022:

- 1. Provide an update to the Court on the progress of discovery.
- 2. Discuss the timing of a Settlement Conference.

The Parties propose that the Court defer discussion of the number of fact depositions to be taken in the case until after Defendants have commenced their production of ESI, as the contents of ESI may inform the Parties' discussions concerning depositions.

Dated: January 12, 2022 Respectfully submitted,

By:

/s/ Alexandra Harwin

Alexandra Harwin, NY Bar No. 5347471* SANFORD HEISLER SHARP, LLP

1350 Avenue of the Americas, 31st Fl.

New York, NY 10019 Telephone: (646) 402-5650 Facsimile: (646) 402-5651 aharwin@sanfordheisler.com

Charles Field, CA Bar No. 189817*

SANFORD HEISLER SHARP, LLP

2550 Fifth Avenue, 11th Floor

San Diego, CA 92103 Telephone: (619) 577-4242 Facsimile: (619) 577-4250 cfield@sanfordheisler.com

Kevin H. Sharp, TN Bar No. 16287* Leigh Anne St. Charles, TN Bar No. 36945*

SANFORD HEISLER SHARP, LLP

611 Commerce Street, Suite 3100

Nashville, TN 37203

Telephone: (615) 434-7000 Facsimile: (615) 434-7020 ksharp@sanfordheisler.com lstcharles@sanfordheisler.com

Johan Conrod, VA Bar No. 46765*

SANFORD HEISLER SHARP, LLP

700 Pennsylvania Avenue SE, Suite 300 Washington, D.C. 20003

Telephone: (202) 499-5200

By:

/s/ Brian D. Boyle

Brian D. Boyle, DC Bar No. 419773* Meaghan VerGow, DC Bar No. 977165*

O'MELVENY & MYERS LLP

1625 Eye Street, NW Washington, DC 20006 Telephone: (202) 383-5300 Facsimile: (202) 383-5414 mvergow@omm.com bboyle@omm.com

Deborah A. Ellingboe, MN Bar No. 26216X Isaac B. Hall, MN Bar No. 0395398 FAEGRE DRINKER BIDDLE &

REATH LLP

2200 Wells Fargo Center 90 S.

Seventh Street

Minneapolis, Minnesota 55402

Telephone: (612) 766-8713 Facsimile: (612) 766-1600

debbie.ellingboe@faegredrinker.com

*admitted pro hac vice

Counsel for Defendants

Facsimile: (202) 499-5199 jconrod@sanfordheisler.com

Susan M. Coler, MN Bar No. 0217621 **HALUNEN LAW**1650 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 605-4098
Facsimile: (612) 605-4099
coler@halunenlaw.com

*admitted pro hac vice

Counsel for Plaintiff and the Proposed Class